



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Gary Ruffner, Treasurer
Utility Workers Union of America Political
Contributions Committee
815 16th Street, NW, Room 605
Washington, DC 20006

FEB 13 2002

Identification Number: C00040741

Reference: Mid-Year Report (1/1/01-6/30/01)

Dear Mr. Ruffner:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a receipt(s) from an organization(s) that is not registered with the Commission. 2 U.S.C. §441b prohibits the receipt of funds from national banks, corporations, and labor organizations. Under 11 CFR §102.6, however, certain entities may serve as collecting agents for the purpose of transmitting contributions to a separate segregated fund. A collecting agent may be, but is not limited to, a committee which is affiliated with the separate segregated fund; the connected organization; or a local, national, or international union.

Funds received from a collecting agent are to be attributed to the original contributors and should be disclosed according to the requirements of 11 CFR §104.3(a). If the amounts in question were contributed by individuals and transmuted to your committee by a collecting agent, the activity should be included on Line 11(a)(i) of the Detailed Summary Page. Any contribution from an individual exceeding \$200 in the aggregate during the calendar year should be itemized on a supporting Schedule A. Collecting agents need not be identified on your report.

If any apparently prohibited contribution in question was incompletely or

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incorrectly disclosed, you should amend your original report with clarifying information.

If you have received funds from an entity which was not serving as a collecting agent, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR 103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Schedule A supporting Line 11(a)(i) of your report discloses a receipt(s) from "Region 1 Conference" and "Region 3 Conference". Please be advised that federal regulations require the itemization of all contributions from individuals/persons that aggregate greater than \$200 in the calendar year. Please clarify whether this figure includes any receipts that aggregate greater than \$200 from an individual/person. If this is the case, please amend your report(s) by itemizing the receipts on Schedule A. 11 CFR §104.3(a)(2)

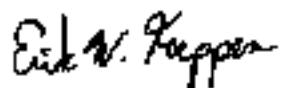
-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the total amount deducted for the entire reporting period for each individual. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days

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of the date of this letter. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Erik W. Koeppen
Reports Analyst
Reports Analysis Division

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s)
 or each category of the
 Detailed Summary Page

FOR LINE NUMBER:				PAGE 10 / 28									
(check only one)				<input checked="" type="checkbox"/>	11a	<input type="checkbox"/>	11b	<input type="checkbox"/>	11c	<input type="checkbox"/>	12		
				<input type="checkbox"/>	13	<input type="checkbox"/>	14	<input type="checkbox"/>	15	<input type="checkbox"/>	16	<input type="checkbox"/>	17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
UTILITY WORKERS UNION OF AMERICA POLITICAL CONTRIBUTIONS COMMITTEE

Full Name (Last, First, Middle Initial)

A. **RONALD LAFOREST**

Mailing Address

1900 1/2 S. WENONA ST

City

BAY CITY

State

MI

Zip Code

48706

Date of Receipt

06/30/2001

Amount of Each Receipt this Period

665.74

PAYROLL DEDUCTION

Transaction ID: **SA11A1.4136**

Full Name (Last, First, Middle Initial)

B. **MICHAEL LANGFORD**

Mailing Address

2711 S. OTTER CREEK

State

MI

Zip Code

48145

Date of Receipt

06/30/2001

Amount of Each Receipt this Period

300.00

PAYROLL DEDUCTION

Transaction ID: **SA11A1.4160**

Full Name (Last, First, Middle Initial)

C. **UWUA AFL-CIO LOCAL 102**

Mailing Address

HC-64 BOX 93D

City

RECTOR

State

PA

Zip Code

16877

Date of Receipt

06/30/2001

Amount of Each Receipt this Period

4176.50

PAY DEDUCTION NOT ITEMIZED UNDER \$200

Transaction ID: **SA11A1.4458**

SUBTOTAL of Receipts This Page (optional)

5042.24

TOTAL This Period (last page this line number only)

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s)
 or each category of the
 Detailed Summary Page

FOR LINE NUMBER: PAGE 11/28

(check only one)

<input checked="" type="checkbox"/>	11a	<input type="checkbox"/>	11b	<input type="checkbox"/>	11c	<input type="checkbox"/>	12
<input type="checkbox"/>	13	<input type="checkbox"/>	14	<input type="checkbox"/>	15	<input type="checkbox"/>	16
							17

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 or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

UTILITY WORKERS UNION OF AMERICA POLITICAL CONTRIBUTIONS COMMITTEE

Full Name (Last, First, Middle Initial)

A. UWUA, AFL-CIO LOCAL 132

Mailing Address

7200 GREENLEAF AVENUE #380

State Zip Code

City

WHITTIER

CA

90601

FEC ID number of contributing
 federal political committee.

Name of Employer

SOUTHERN CAL GAS

Occupation

Receipt For:

Primary General

Aggregate Year-to-Date ▼

19770.58

Other (specify) ▼

Date of Receipt

MM/DD/YY / MM/DD/YY / MM/DD/YY

06 / 30 / 2001

Amount of Each Receipt this Period

19770.58

PAY DEDUCTIONS NOT ITEMIZED UNDER \$200

Transaction ID: SA11A1.4444

Date of Receipt

MM/DD/YY / MM/DD/YY / MM/DD/YY

06 / 30 / 2001

Amount of Each Receipt this Period

964.00

PAY DEDUCTION NOT ITEMIZED UNDER \$200

Transaction ID: SA11A1.4450

Date of Receipt

MM/DD/YY / MM/DD/YY / MM/DD/YY

06 / 30 / 2001

Amount of Each Receipt this Period

499.50

PAY DEDUCTION NOT ITEMIZED UNDER \$200

Transaction ID: SA11A1.4452

21234.08

Full Name (Last, First, Middle Initial)

C. UWUA, AFL-CIO LOCAL 180

Mailing Address

421 23RD AVENUE

State Zip Code

City

ALTOONA

PA

16601

FEC ID number of contributing
 federal political committee.

Name of Employer

GPU ENERGY INC

Occupation

Receipt For:

Primary General

Aggregate Year-to-Date ▼

499.50

Other (specify) ▼

SUBTOTAL of Receipts This Page (optional) ►

TOTAL This Period (last page this line number only) ►

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s)
 or each category of the
 Detailed Summary Page

FOR LINE NUMBER: PAGE 12 / 28

<input checked="" type="checkbox"/>	11a	<input type="checkbox"/>	11b	<input type="checkbox"/>	11c	<input type="checkbox"/>	12
<input type="checkbox"/>	13	<input type="checkbox"/>	14	<input type="checkbox"/>	15	<input type="checkbox"/>	16
							17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions
 or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

UTILITY WORKERS UNION OF AMERICA POLITICAL CONTRIBUTIONS COMMITTEE

Full Name (Last, First, Middle Initial)

A. UWUA AFL-CIO LOCAL 223

Mailing Address

7041 SCHAEFFER ROAD

City

DEARBORN

State

MI

Zip Code

48128

FEC ID number of contributing
 federal political committee.

Date of Receipt

06 30 2001

Amount of Each Receipt this Period

1582.00

PAY DEDUCTION NOT ITEMIZED UNDER \$200

Transaction ID: SA11A1.4481

Full Name (Last, First, Middle Initial)

B. UWUA AFL-CIO LOCAL 246

Mailing Address

10355 LOS ALAMITOS BLVD

City

LOS ALAMITOS

State

CA

Zip Code

90720

FEC ID number of contributing
 federal political committee.

Date of Receipt

06 30 2001

Amount of Each Receipt this Period

5081.86

PAY DEDUCTION NOT ITEMIZED UNDER \$200

Transaction ID: SA11A1.4446

Full Name (Last, First, Middle Initial)

C. UWUA AFL-CIO LOCAL 310

Mailing Address

70810 KAGG HILL RD

City

ST CLAIRSVILLE

State

OH

Zip Code

43950

FEC ID number of contributing
 federal political committee.

Date of Receipt

06 30 2001

Amount of Each Receipt this Period

476.00

PAY DEDUCTION NOT ITEMIZED UNDER \$200

Transaction ID: SA11A1.4454

SUBTOTAL of Receipts This Page (optional) ►

7139.86

TOTAL This Period (last page this line number only) ►

PAYROLL DEDUCTIONS

SCHEDULE A (FEC Form 3X)		Use separate schedule(s) for each category of the Detailed Summary Page	FORM DATE DRAFTED: PAGE 1 OF 1 (Block copy date)	
ITEMIZED RECEIPTS			11a 11b 11c 11d 11e 11f 11g 11h 11i 11j 11k 11l 11m 11n 11o	
<p>Any information copied from such Report and Schedule may be held valid or used by any person for the purpose of calculating contributions or for determinative purposes, except that using the name and address of any political committee to which contributions from such committee.</p> <p>NAME OF COMMITTEE (In Puff)</p> <p><u>Critical Reasons Inc., PAC</u></p> <p>FULL NAME (Last, First, Middle Initial)</p> <p>4. Kent, Emmanuel</p> <p>Mailing Address</p> <p><u>15 Chelmsford Ave</u></p> <p>City</p> <p><u>Washington</u></p> <p>State</p> <p><u>VA</u></p> <p>Zip Code</p> <p><u>20033</u></p> <p>PLA ID number of contributing federal political committee</p> <p><u>C [REDACTED]</u></p> <p>Name of Employer</p> <p><u>Childress Financial Inc.</u></p> <p>Occupation</p> <p><u>Executive Officer</u></p> <p>Period For:</p> <p><input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify) <u>[REDACTED]</u></p> <p>Aggregate Total To Date</p> <p><u>285.00</u></p>				Payroll deduction^a
			Date of Receipt	<u>[REDACTED] / <u>[REDACTED] / <u>[REDACTED]</u></u></u>
			Amount of Each Receipt this Period	<u>90.00</u>
			(S18 biweekly)^b	

***Adding Extra Text/Explanation:** When using FECFile electronic filing software, this information can be entered using the "memo text" window. To make a "memo text" entry, select the "View" menu on the FECFILE toolbar. Select "All Transactions." Single click (highlight) the transaction to which the "memo text" will be attached. Then select the "Edit" menu on the toolbar AND select "memo text."

*When using FRS/ML electronic Client software, enter this information in the "Description" field.

Categorizing Receipts

Before beginning to itemize the committee's receipts, separate them into the different categories listed on the Detailed Summary Page ("Contributions from Individuals," "Contributions from Political Committees," etc.; an illustration of a completed Detailed Summary Page appears on pages 54-65). The receipts in each category must be itemized on a separate Schedule A designated for that category.

Indicate the type of receipt itemized on a particular Schedule A by checking the box for the corresponding line number from the Detailed Summary Page where indicated in the upper right corner of the schedule. The appropriate category of receipt may also be written at the top of each page.

Some categories may require several pages. The total for each category should be entered on the bottom line of the last page for that category.

Itemized Information

For each itemized contribution, provide:

- The full name and address (including zip code) of the contributor or other source;
 - The name of the contributor's employer (if the contributor is an individual);

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, type "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor.

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 18 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$80), providing the year-to-date total in the appropriate space. (See Item A in the illustration above.)

